



Office of Environment, Safety and Health

Program Reviews Lessons Learned

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Introduction

- ✓ **Review performed by OE to evaluate contractor's program for identifying, screening, reporting, tracking and correcting PAAA noncompliances**
- ✓ **Not an investigation**

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Introduction (*cont'd*)

- ✓ **Objectives:**
 - **Encourage effective ID and reporting**
 - **Enhance uniformity**
 - **Determine effectiveness**
 - **Develop lessons learned**
- ✓ **EGS 00-02 describes approach used**

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Implementation

- ✓ **First Round - 2000 through 2003**
- ✓ **Second Round – 2004 to present**
- ✓ **Second Round scheduling reflects a variety of factors**

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Implementation *(cont'd)*

First Round

- ✓ Significant deficiencies, gaps
- ✓ Observed maturation during first round

Second Round

- ✓ Raised the bar – expect all elements in place
- ✓ Emphasis on assessments, cause analysis – mandatory elements
- ✓ Results - 13 completed, 10 improved or maintained

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Lessons Learned

- ✓ Intent to summarize global strengths, weaknesses OE has seen
- ✓ Program review reports more detailed, available on webpage
- ✓ www.eh.doe.gov/enforce/

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Lessons Learned

General Implementation

- ✓ **Overall - significant improvement in formality of procedures, level of implementation and consistency of programs**
- ✓ **PAAA training target audience expanded**

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Lessons Learned

General Implementation (cont'd)

- ✓ **PAAA coordinators lacking adequate authority and accessibility to upper management**
- ✓ **Subcontractors not always integrated into the program**

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Lessons Learned

Identification and Screening

- ✓ **Move to centralized issue-tracking systems provide better information capture and trending**
- ✓ **Typically a wide variety of information sources are being reviewed**
- ✓ **In general, appropriate screening decisions are being made**

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Lessons Learned

Identification and Screening (cont'd)

- ✓ **Basis for screening decisions not always well documented**
- ✓ **De-centralized programs leading to inconsistent information flow, screening**
- ✓ **Failure to capture noncompliances corrected on the spot**

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Lessons Learned

Evaluation of Reportability

- ✓ **Reporting based on event thresholds typically done well**
- ✓ **Information content needs improvement**
- ✓ **Repetitive/programmatic issues not consistently recognized - trending still a concern**
- ✓ **Site review processes don't always ensure that 20-day guidelines are met**

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Lessons Learned

Cause Determination/Corrective Actions

- ✓ **Increasing use of extent-of-condition and effectiveness reviews**
- ✓ **NTS closure processes typically rigorous, include independent validation**
- ✓ **Increased use of formal drivers for cause analysis**

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Lessons Learned

Cause Determination/Corrective Actions (cont'd)

- ✓ **Cause analysis not always identifying all significant causes**
- ✓ **Recurring deficiencies indicate that problem causes are not being accurately identified and corrected**

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Lessons Learned *Assessments*

- ✓ **Continuing OE focus area**
- ✓ **Strength – SR FEB process for conducting Independent Assessments**
- ✓ **Assessment programs not always in place or effective at finding issues**

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Lessons Learned Assessments (cont'd)

- ✓ Findings not always entered into quality problem tracking system
- ✓ Formal training for management assessors not consistently implemented

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Lessons Learned

PAAA Program Assessments

- ✓ **Significant improvement**
- ✓ **Use of visiting PAAA Coordinators**
- ✓ **Benchmark against other sites using Program Review Reports**

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Lessons Learned

10 CFR 835 Audits

- ✓ **Credit taken for DOE audits**
- ✓ **Use of unqualified assessors**
- ✓ **Performance issues – not all areas completed, non performance-based**

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Future Activities

- ✓ **Continue second round of reviews**
- ✓ **Conduct table top reviews**
- ✓ **Update EGS**
- ✓ **Potential contractor self-regulation**

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